

UNITED STATES DISTRICT COURT

for the
Western District of Washington

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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
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In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*INFORMATION ASSOCIATED WITH THREE
FACEBOOK ACCOUNTS

Case No.

MJ20-5016

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A, attached hereto and incorporated herein by reference.

located in the Northern District of California, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, attached hereto and incorporated by reference herein.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 18 USC § 1073

Offense Description
 Unlawful Flight to Avoid Prosecution

The application is based on these facts:

See Affidavit of FBI Special Agent Terrance G. Postma, attached hereto and incorporated by reference herein.

- ☒ Continued on the attached sheet.
☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Terrance G. Postma

Applicant's signature

Terrance G. Postma, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/07/2020

D. Christel

*Judge's signature*City and state: Tacoma, Washington

Hon. David W. Christel, United States Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF WASHINGTON)
) ss
COUNTY OF PIERCE)

I, Terrance G. Postma, being first duly sworn, hereby depose and state as follows:

BACKGROUND

1. I have been employed as a Special Agent of the FBI since June 2002 and am currently assigned to the Seattle Division's Tacoma Resident Agency. I am responsible for investigations of violent crime, fugitives, and bank robbery. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to search the information described in Attachment A for the purpose of locating and apprehending Santiago Mederos who has a federal arrest warrant issued in the Western District of Washington for a charge of Unlawful Flight to Avoid Prosecution, Title 18, United States Code, Sections 1073 (MJ16-5179) arising from his flight from the Western District of Washington to avoid charges of murder, as described below. There is also probable cause to search the information described in Attachment A for evidence in the fugitive investigation, as described in Attachment B.

PURPOSE OF AFFIDAVIT

4. I make this affidavit in support of an application for a search warrant for information associated with the following Facebook accounts ("Subject Accounts"):

(1) Facebook user ID 100040501718452 (Subject Account 1), registered under the username Antono Mendoza, but for reasons stated below, is believed to be used by Santiago Mederos.

(2) Facebook user ID 100036795438133 (Subject Account 2), registered under the username Antony Villa, but for reasons stated below, is believed to be used by Santiago Mederos.

(3) Facebook user ID 100034394750948 (Subject Account 3), registered under the username Alma Arenas, an alias for Alma Arellano, who has been in a relationship and in communication with Santiago Mederos since his flight from prosecution.

5. All of the requested information is stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with Subject Accounts.

PRIOR APPLICATION

6. This is the first such request for the Subject Accounts.

SUMMARY OF PROBABLE CAUSE

7. In 2010, Santiago Mederos fled from Tacoma to Mexico after the murder of Camille Love and Jose Lucas. Santiago Mederos has outstanding warrants for the respective murders, and this Court has charged him for violation of Unlawful Flight to Avoid Prosecution, Title 18, United States Code, Sections 1073 on September 30, 2016 under Case No. MJ16-5179.

8. As described below, investigation by law enforcement has led to a Mexican phone number that is associated with a WhatsApp account that posted a picture of Santiago Mederos. The user of that number also has a Facebook account (Subject Account 1), which has shared a machine with Subject Account 2 (both accounts logged

1 onto Facebook from the same device). Both Subject Account 1 and 2 are registered
2 under aliases of Santiago Mederos. Further, law enforcement has identified Subject
3 Account 3 as belonging to Alma Arellano, who has been in a romantic relationship with
4 Santiago Mederos since his flight from prosecution.

5 **STATEMENT OF PROBABLE CAUSE**

6 **A. SANTIAGO MEDEROS AND THE LOVE AND LUCAS MURDERS**

7 9. On February 7, 2010, Tacoma Police Department (TPD) officers
8 responded to the 5900 block of Portland Avenue regarding a shooting. At the scene, TPD
9 officers and detectives discovered that Camile Love was the shooting victim. Love died
10 from the injuries sustained in the shooting. Based on interviews of witnesses and
11 informants who admitted to participation in the shooting, the TPD detectives concluded
12 that Santiago Mederos was the prime suspect in Love's murder and that the shooting was
13 a result of a gang turf war.

14 10. On March 25, 2010, a homicide occurred within the city of Tacoma. TPD
15 detectives identified the homicide victim as Jose Saul Lucas and identified the prime
16 suspect in his murder as Santiago Mederos. Based on interviews of two witnesses, TPD
17 detectives concluded that Santiago Mederos, a known member of the Eastside Lokotes
18 Sureños (ELS) gang, and four other ELS gang members went to the residence of a rival
19 gang member, Reynaldo Orozco, to collect money. When they could not find the rival
20 gang member, they broke into and damaged Orozco's car, which was parked at the
21 residence. When three individuals, who lived with Orozco, realized that the ELS gang
22 members were vandalizing Orozco's vehicle, they confronted the gang members and a
23 fight ensued. While attempting to flee the scene, Santiago Mederos and his accomplices
24 fired a single gunshot, which struck and killed one of Orozco's roommates, Jose Saul
25 Lucas.

26 11. As a result of their initial investigation, TPD detectives obtained an arrest
27 warrant for Santiago Mederos for his involvement in the homicide. Further investigation,
28 to include interviews with witnesses, friends and family members, revealed that Santiago

1 Mederos is aware that he has a warrant for his arrest and has subsequently gone into
2 hiding.

3 12. Ashley Rios, a friend of Santiago Mederos, stated in an interview with
4 TPD detectives that she travelled to Mexico with Santiago Mederos, travelling to his
5 Aunt's residence in Guerrero, Mexico, shortly after the Lucas murder.

6 13. Efforts to date to locate Santiago Mederos in Mexico have been
7 unsuccessful.

8 **B. SUBJECT ACCOUNTS**

9 14. In the course of this investigation, law enforcement has reviewed
10 telephone records of members of the Mederos family and records of telephone numbers
11 that are in communication with members of the Mederos family. In the course of
12 reviewing those records, law enforcement identified a number, +52-7341170819.
13 According to call records, the number ending in 0819 is in communication with
14 individuals who are close to the Mederos family.

15 15. A search of publicly available information online indicate that the user of
16 the number ending in 0819 has a WhatsApp account under the same telephone number.
17 The WhatsApp account included a public profile picture of an individual who resembles
18 Santiago Mederos and an unknown adult female and an unknown juvenile female. Law
19 enforcement has reviewed the WhatsApp profile picture associated with the number
20 ending in 0819 and observed that the male individual in the WhatsApp profile picture has
21 a tattoo on the right side of his neck and on his right shoulder. These tattoos and the
22 appearance of the individual's face match a photograph of Santiago Mederos that law
23 enforcement obtained from a prior Facebook search warrant return in this investigation.

24 16. Based on review of records returned to investigators by Facebook, Inc.
25 pursuant to a prior order of this Court, the user of the number ending in 0819 also has a
26 Facebook account registered under the same number ending in 0819 ("Subject Account
27 1). Subject Account 1 is registered under the username "Antono Mendoza," and prior
28

1 search warrant returns indicate that “Antono” or “Antony” are common aliases for
2 Santiago Mederos.

3 17. Open source research reveals that the username of Subject Account 2 is
4 “Antony Villa.” Facebook records returned to investigators pursuant to an order of this
5 court revealed that the username for two other Facebook account know to have been
6 previously used by Santiago Mederos are “Anthony Villa” and “Antonio Villa,” which is
7 based on Mederos’s other family name, Villalba.

8 18. Based on review of records returned to investigators by Facebook, Inc.
9 pursuant to a prior order of this court, Subject Account 1 and Subject Account 2 are
10 linked by machine cookie, which means that two particular accounts have been accessed
11 by the same individual machine (e.g., two Facebook accounts that have been accessed on
12 the same phone). Such a “link” between two accounts indicates that the users are the
13 same person or in close proximity to each other.

14 19. Subject Account 3 is registered to “Alma Arenas,” which is an alias for
15 Alma Arellano, who has been in a relationship with and in communication with Santiago
16 Mederos sine his flight from prosecution as described below. On February 5, 2020, the
17 user of Subject Account 3 posted a public profile picture that depicted Alma Arellano,
18 whose identity is known to law enforcement due to prior search warrant returns in this
19 investigation. Subject Account 3 is linked by machine cookie to two Facebook accounts
20 that law enforcement has identified over the course of this investigation as belonging to
21 Santiago Mederos and Alma Arellano. The first of the two accounts is a Facebook
22 account with user ID 100003818697848, registered to “Toño Gomez,” but which is
23 believed to be used by Santiago Mederos because the user identified himself as
24 “Santiago” in a posting. In addition, the user listed himself as engaged to Alma Villa,
25 also known as Alma Arellano and Alma Arenas, who was in relationship with Santiago
26 Mederos at the time, as law enforcement knows from prior search warrant returns.
27 Finally, the user of the account ending in 7848 listed himself as from “Cuernavaca,”
28

1 which is also where Santiago Mederos has resided since his flight from prosecution based
2 on witness interviews.

3 20. Subject Account 3 is also linked by machine cookie with a Facebook
4 account with user ID 100001647003884, registered under the name Alma Yesi, but
5 believed to be used by Alma Arellano, who has been in a relationship with Santiago
6 Mederos. Law enforcement came to that conclusion because the account ending in 3884
7 posted pictures of Alma Arellano and uploaded a picture of Arellano and Mederos in an
8 embrace. The user of the account ending in 3884 also posted a message on the account
9 ending in 7848 (believed to be used by Mederos) that read as follows: "<3 I <3 LOVE <3
10 YOU <3 SANTIAGO <3 Y <3 ALMA <3." Furthermore, the account was previously
11 registered under the name "Alma Villa," an alias of Alma Arellano based on the name
12 Villalba, which is a family name of Santiago Mederos.

13 **C. FACEBOOK INFORMATION STORAGE**

14 21. I am aware from my experience and training, and consultation with other
15 investigators, of the following information about Facebook:

16 22. Facebook owns and operates a free-access social networking website of
17 the same name that can be accessed at <http://www.facebook.com>. Facebook allows its
18 users to establish accounts with Facebook, and users can then use their accounts to share
19 written news, photographs, videos, and other information with other Facebook users, and
20 sometimes with the public.

21 23. Facebook asks users to provide basic contact and personal identifying
22 information to Facebook, either during the registration process or thereafter. This
23 information may include the user's full name, birth date, gender, contact e-mail
24 addresses, Facebook passwords, Facebook security questions and answers (for password
25 retrieval), physical address (including city, state, and zip code), telephone numbers,
26 screen names, websites, and other personal identifiers. Facebook also assigns a user
27 identification number to each account.
28

1 24. I know from speaking with other law enforcement that “cookies” are
2 small files placed by a server (such as those used by Facebook) on a device to track the
3 user and potentially verify a user’s authentication status across multiple sites or
4 webpages. This cookie could be unique to a particular account (e.g., the Facebook
5 account) or to a given device (e.g., the particular phone used to access the Facebook
6 account). The next time a user visits a particular site or server, the server will ask for
7 certain cookies to see if the server has interacted with that user before. Cookies can also
8 be used to determine “machine cookie overlap,” or multiple accounts that have been
9 accessed by the same individual machine (e.g., two Facebook accounts that have been
10 accessed on the same phone). The machine cookie overlap thus allows Facebook to track
11 accounts that are “linked” to each other because the same user account (username on a
12 computer) on the same device accessed multiple Facebook accounts. This can identify
13 either multiple Facebook accounts used by the same person or used by different people
14 sharing the same user account and device. In either case, the machine cookie overlap
15 means that the users of the linked accounts are the same person or two people in close
16 proximity to each other.

17 25. Facebook users may join one or more groups or networks to connect and
18 interact with other users who are members of the same group or network. Facebook
19 assigns a group identification number to each group. A Facebook user can also connect
20 directly with individual Facebook users by sending each user a “Friend Request.” If the
21 recipient of a “Friend Request” accepts the request, then the two users will become
22 “Friends” for purposes of Facebook and can exchange communications or view
23 information about each other. Each Facebook user’s account includes a list of that user’s
24 “Friends” and a “News Feed,” which highlights information about the user’s “Friends,”
25 such as profile changes, upcoming events, and birthdays.

26 26. Facebook users can select different levels of privacy for the
27 communications and information associated with their Facebook accounts. By adjusting
28 these privacy settings, a Facebook user can make information available only to himself or

1 herself, to particular Facebook users, or to anyone with access to the Internet, including
2 people who are not Facebook users. A Facebook user can also create “lists” of Facebook
3 friends to facilitate the application of these privacy settings. Facebook accounts also
4 include other account settings that users can adjust to control, for example, the types of
5 notifications they receive from Facebook.

6 27. Facebook users can create profiles that include photographs, lists of
7 personal interests, and other information. Facebook users can also post “status” updates
8 about their whereabouts and actions, as well as links to videos, photographs, articles, and
9 other items available elsewhere on the Internet. Facebook users can also post information
10 about upcoming “events,” such as social occasions, by listing the event’s time, location,
11 host, and guest list. In addition, Facebook users can “check in” to particular locations or
12 add their geographic locations to their Facebook posts, thereby revealing their geographic
13 locations at particular dates and times. A particular user’s profile page also includes a
14 “Wall,” which is a space where the user and his or her “Friends” can post messages,
15 attachments, and links that will typically be visible to anyone who can view the user’s
16 profile.

17 28. Facebook allows users to upload photos and videos. It also provides users
18 the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is
19 tagged in a photo or video, he or she receives a notification of the tag and a link to see the
20 photo or video. For Facebook’s purposes, the photos and videos associated with a user’s
21 account will include all photos and videos uploaded by that user that have not been
22 deleted, as well as all photos and videos uploaded by any user that have that user tagged
23 in them.

24 29. Facebook users can exchange private messages on Facebook with other
25 users. These messages, which are similar to e-mail messages, are sent to the recipient’s
26 “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well
27 as other information. Facebook users can also post comments on the Facebook profiles
28 of other users or on their own profiles; such comments are typically associated with a

1 specific posting or item on the profile. In addition, Facebook has a Chat feature that
2 allows users to send and receive instant messages through Facebook. These chat
3 communications are stored in the chat history for the account. Facebook also has a Video
4 Calling feature, and although Facebook does not record the calls themselves, it does keep
5 records of the date of each call.

6 30. If a Facebook user does not want to interact with another user on
7 Facebook, the first user can “block” the second user from seeing his or her account.

8 31. Facebook has a “like” feature that allows users to give positive feedback
9 or connect to particular pages. Facebook users can “like” Facebook posts or updates, as
10 well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook
11 users can also become “fans” of particular Facebook pages.

12 32. Facebook has a search function that enables its users to search Facebook
13 for keywords, usernames, or pages, among other things.

14 33. Each Facebook account has an activity log, which is a list of the user’s
15 posts and other Facebook activities from the inception of the account to the present. The
16 activity log includes stories and photos that the user has been tagged in, as well as
17 connections made through the account, such as “liking” a Facebook page or adding
18 someone as a friend. The activity log is visible to the user but cannot be viewed by
19 people who visit the user’s Facebook page.

20 34. Facebook Notes is a blogging feature available to Facebook users, and it
21 enables users to write and post notes or personal web logs (“blogs”), or to import their
22 blogs from other services, such as Xanga, LiveJournal, and Blogger.

23 35. The Facebook Gifts feature allows users to send virtual “gifts” to their
24 friends that appear as icons on the recipient’s profile page. Gifts cost money to purchase,
25 and a personalized message can be attached to each gift. Facebook users can also send
26 each other “pokes,” which are free and simply result in a notification to the recipient that
27 he or she has been “poked” by the sender.
28

1 36. Facebook also has a Marketplace feature, which allows users to post free
2 classified ads. Users can post items for sale, housing, jobs, and other items on the
3 Marketplace.

4 37. In addition to the applications described above, Facebook also provides
5 its users with access to thousands of other applications on the Facebook platform. When
6 a Facebook user accesses or uses one of these applications, an update about that the
7 user's access or use of that application may appear on the user's profile page.

8 38. Some Facebook pages are affiliated with groups of users, rather than one
9 individual user. Membership in the group is monitored and regulated by the
10 administrator or head of the group, who can invite new members and reject or accept
11 requests by users to enter. Facebook can identify all users who are currently registered to
12 a particular group and can identify the administrator and/or creator of the group.
13 Facebook uses the term "Group Contact Info" to describe the contact information for the
14 group's creator and/or administrator, as well as a PDF of the current status of the group
15 profile page.

16 39. Facebook uses the term "Neoprint" to describe an expanded view of a
17 given user profile. The "Neoprint" for a given user can include the following information
18 from the user's profile: profile contact information; News Feed information; status
19 updates; links to videos, photographs, articles, and other items; Notes; Wall postings;
20 friend lists, including the friends' Facebook user identification numbers; groups and
21 networks of which the user is a member, including the groups' Facebook group
22 identification numbers; future and past event postings; rejected "Friend" requests;
23 comments; gifts; pokes; tags; and information about the user's access and use of
24 Facebook applications.

25 40. Facebook also retains Internet Protocol ("IP") logs for a given user ID or
26 IP address. These logs may contain information about the actions taken by the user ID or
27 IP address on Facebook, including information about the type of action, the date and time
28 of the action, and the user ID and IP address associated with the action. For example, if a

1 user views a Facebook profile, that user's IP log would reflect the fact that the user
2 viewed the profile, and would show when and from what IP address the user did so.

3 41. Social networking providers like Facebook typically retain additional
4 information about their users' accounts, such as information about the length of service
5 (including start date), the types of service utilized, and the means and source of any
6 payments associated with the service (including any credit card or bank account number).
7 In some cases, Facebook users may communicate directly with Facebook about issues
8 relating to their accounts, such as technical problems, billing inquiries, or complaints
9 from other users. Social networking providers like Facebook typically retain records
10 about such communications, including records of contacts between the user and the
11 provider's support services, as well as records of any actions taken by the provider or
12 user as a result of the communications.

13 42. Therefore, the computers of Facebook are likely to contain all the material
14 described above, including stored electronic communications and information concerning
15 subscribers and their use of Facebook, such as account access information, transaction
16 information, and other account information. I believe such information is likely to help
17 me locate the fugitive described in this affidavit.

18 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

19 43. I anticipate executing this warrant under the Electronic Communications
20 Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by
21 using the warrant to require Facebook to disclose to the government copies of the records
22 and other information (including the content of communications) particularly described in
23 Section I of Attachment B. Upon receipt of the information described in Section I of
24 Attachment B, government-authorized persons will review that information to locate the
25 items described in Section II of Attachment B.

26 44. As indicated in the Motion for Nondisclosure and Motion to Seal that
27 accompany this affidavit, the government requests, pursuant to the preclusion of notice
28 provisions of Title 18, United States Code, Section 2705(b), that Facebook be ordered not

1 to notify any person (including the subscriber or customer to which the materials relate)
2 of the existence of this warrant for such period as the Court deems appropriate. The
3 government submits that such an order is justified because notification of the existence of
4 this Order would seriously jeopardize the ongoing investigation. Such a disclosure would
5 give the subscriber an opportunity to destroy evidence, change patterns of behavior,
6 notify confederates, or flee or continue his flight from prosecution.

7 45. It is further respectfully requested that this Court issue an order sealing all
8 papers submitted in support of this application, including the application and search
9 warrant until such dates as provided in the proposed Order. I believe that sealing this
10 document is necessary because the items and information to be seized are relevant to an
11 ongoing investigation. Premature disclosure of the contents of this affidavit and related
12 documents may have a significant and negative impact on the continuing investigation
13 and may severely jeopardize its effectiveness.

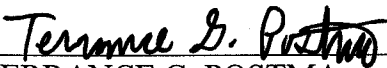
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16 //

1 **CONCLUSION**

2 46. Based on the forgoing, I request that the Court issue the proposed search
 3 warrant. This Court has jurisdiction to issue the requested warrant because it is "a court
 4 of competent jurisdiction" as defined by 18 U.S.C. § 2711. *See* 18 U.S.C. §§ 2703(a),
 5 (b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States . . .
 6 that – has jurisdiction over the offense being investigated." 18 U.S.C. § 2711(3)(A)(i).
 7 Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not
 8 required for the service or execution of this warrant. Accordingly, by this Affidavit and
 9 Warrant, I seek authority for the government to search all of the items specified in
 10 Section I, Attachment B (attached hereto and incorporated by reference herein) to the
 11 Warrant, and specifically to seize all of the data, documents and records that are
 12 identified in Section II to that same Attachment.

13
 14 
 15 TERRANCE G. POSTMA
 16 Special Agent
 17 Federal Bureau of Investigation

18 The above-named agent provided a sworn statement attesting to the truth of the
 19 contents of the foregoing affidavit on this 7th day of February, 2020.

20
 21 
 22 HON. DAVID W. CHRISTEL
 23 United States Magistrate Judge
 24
 25
 26
 27
 28

ATTACHMENT A

Property to Be Searched

This warrant applies to information associated with the following two accounts, each identified by Facebook user ID ("Subject Accounts") (1) 100040501718452; (2) 100036795438133; and (3) 100034394750948 for all such information that is stored at premises owned, maintained, controlled, or operated by Facebook, a company headquartered in Menlo Park, California.

ATTACHMENT B

Particular Things to be Seized

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment A is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

A. The following information about the customers or subscribers of the Subject Accounts:

- (a) User Neoprint - all user contact and personal identifying information, including full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers associated with the current profile information, and all wall postings and messages to and from the user.
- (b) All activity logs for the Subject Accounts and all other documents showing the user's posts and other Facebook activities;
- (c) User photoprint and videos - all photos and videos uploaded, "liked", or tagged by the user, along with all photos uploaded by any user which have the user tagged in them, any associated photos or links to photos in their original format, including all original meta-data or "EXIF" information;

- 1 (d) All profile information; News Feed information; status updates; links to
- 2 videos, photographs, articles, and other items; Notes; Wall postings; friend
- 3 and family lists, including the friend and family Facebook user
- 4 identification numbers; groups and networks of which the user is a member,
- 5 including the groups' Facebook group identification numbers; future and
- 6 past event postings; rejected "Friend" requests; comments; gifts; pokes;
- 7 tags; and information about the user's access and use of Facebook
- 8 applications;
- 9 (e) All other records of communications and messages made or received by the
- 10 user, including all private messages, chat history, calling history, and
- 11 pending "Friend" requests;
- 12 (f) All "check ins" and other location information;
- 13 (g) I.P. Logs - all IP logs showing log-in and log-off and intraconnection I.P.
- 14 activity including I.P. addresses and date/time stamps for account accesses
- 15 as well as account creation I.P. address, date, and time. Provide source port
- 16 information for each I.P. log-in and log-off event for the Subject Accounts;
- 17 (h) All records of the Subject Accounts' usage of the "Like" feature, including
- 18 all Facebook posts and all non-Facebook webpages and content that the
- 19 user has "liked";
- 20 (i) All information about the Facebook pages that each Subject Account is or
- 21 was a "fan" of;
- 22 (j) User Friends List/Information – provide a full list of all past and present
- 23 friends for the Subject Accounts, including all messages and postings
- 24 between accounts and listed friends;
- 25 (k) All records of Facebook searches performed by the Subject Accounts;
- 26 (l) All information about the user's access and use of Facebook Marketplace;
- 27 (m) The types of service utilized by the user;
- 28 (n) The length of service (including start date);

- 1 (o) The means and source of payment for such service (including any credit
- 2 card or bank account number) and billing records;
- 3 (p) All privacy settings and other account settings, including privacy settings
- 4 for individual Facebook posts and activities, and all records showing which
- 5 Facebook users have been blocked by the Subject Accounts;
- 6 (q) All records pertaining to communications between Facebook and any
- 7 person regarding the user or the user's Facebook account, including
- 8 contacts with support services and records of actions taken;
- 9 (r) Names (including subscriber names, Facebook user IDs, and screen
- 10 names);
- 11 (s) Addresses (including mailing addresses, residential addresses, business
- 12 addresses, and e-mail addresses);
- 13 (t) Local and long distance telephone connection records;
- 14 (u) Push Tokens - any unique identifiers that would assist in identifying the
- 15 device(s) associated with the Subject Accounts, including push notification
- 16 tokens associated with the Subject Accounts (including Apple Push
- 17 Notification (APN), Google Cloud Messaging (GCM), Microsoft Push
- 18 Notification Service (MPNS), Windows Push Notification Service (WNS),
- 19 Amazon Device Messaging (ADM), and Baidu Cloud Push, phone
- 20 numbers, IMEI/ESN, serial numbers, instrument numbers), MAC
- 21 addresses, IP addresses, email addresses, and subscriber information;
- 22 (v) Records of session times and durations, and the temporarily assigned
- 23 network addresses (such as Internet Protocol ("IP" addresses) associated
- 24 with those sessions along with time, type, machine (including MAC
- 25 addresses) cookie, city, region, country, device, and browser;
- 26 (w) Facial recognition data;
- 27 (x) Linked accounts;
- 28 (y) Family members associated with the user of each Subject Account;

- 1 (z) Work of the user of each Subject Account;
- 2 (aa) Telephone or instrument numbers or identities (including MAC addresses);
- 3 (bb) Other subscriber numbers or identities (including temporarily assigned
- 4 network addresses and registration IP addresses);
- 5 (cc) User Contact Information – all user contact information input by the user
- 6 including name, birthdate, contact email address(es), other related email
- 7 addresses, address, city, state, zip code, all phone numbers, screen name(s),
- 8 and website information, to include basic subscriber information and
- 9 expanded subscriber information;
- 10 (dd) Group Contact Information – a list of the user’s currently registered groups;
- 11 (ee) Location Information – all information pertaining to location data for the
- 12 Subject Accounts, including but not limited to geo-location data and all
- 13 other geo-tagging or geo-location related information;
- 14 (ff) Device Information – all information pertaining to devices used to upload
- 15 photos, posts, messages, or updates, including but not limited to Apple
- 16 UDID, mobile phone number, mobile device ID numbers, and all other
- 17 information related to the devices;
- 18 (gg) Poke Information – all information pertaining to “pokes” initiated by or
- 19 received by the Subject Accounts;
- 20 (hh) Private Messages – all information pertaining to any and all private
- 21 messages to include content, call logs, and location information for the
- 22 Subject Accounts;
- 23 (ii) Facebook Messenger – all information pertaining to any and all incoming
- 24 and outgoing Facebook messenger text strings and conversations for the
- 25 Subject Accounts; and
- 26 (jj) All other account information including: any “about you” information, ads,
- 27 apps and websites, calls and messages, comments, events, following and
- 28 followers, friends, groups, likes and reactions, location history,

1 marketplace, messages, other activity, pages, payment history, photos and
 2 videos, posts, profile information, saved items, search history, security and
 3 login information, and “your places” information.

4 B. All records and other information (not including the contents of communications)
 5 relating to the Subject Accounts, including:

- 6
- 7 (a) Records of user activity for each connection activity for each connection
 8 made to or from the Subject Accounts, including log files; messaging logs;
 9 the date, time, length, and method of connections; data transfer volume;
 10 user names; and source and destination of Internet Protocol addresses;
 11 (b) Information about each communication sent or received by the Subject
 12 Accounts, including the date and time of the communication, the method of
 13 the communication (such as source and destination email addresses, IP
 14 addresses, and telephone numbers); and
 15 (c) Records of any Facebook accounts that are linked to the Subject Accounts
 16 by machine cookies (meaning all Facebook user IDs that logged into
 17 Facebook by the same machine or device as each Subject Account).
 18

19 **II. Information to be seized by the government**

20 All information described above in Section I that relates to the ongoing fugitive
 21 investigation involving Santiago Mederos, including, for each user ID identified on
 22 Attachment A, information pertaining to the following matters:

- 23 (a) Any content including e-mails, messages, texts, photographs (including
 24 metadata), videos (including metadata), visual images, documents,
 25 spreadsheets, address lists, contact lists or communications of any type
 26 which could be used to identify the user and or their location.
 27 (b) Records relating to who created, used, or communicated with the user ID,
 28 including records about their identities and whereabouts.

- 1 (c) All subscriber records associated with the Subject Accounts, including
2 name, address, local and long distance telephone connection records, or
3 records of session times and durations, length of service (including start
4 date) and types of service utilized, telephone or instrument number or other
5 subscriber number or identity, including any temporarily assigned network
6 address, and means and source of payment for such service including any
7 credit card or bank account number.
- 8 (d) Any and all other log records, including IP address captures, associated
9 with the Subject Accounts;
- 10 (e) Any records of communications between Facebook and any person about
11 issues relating to the account, such as technical problems, billing inquiries,
12 or complaints from other users about any of the Subject Accounts. This is
13 to include records of contacts between the subscriber and the provider's
14 support services, as well as records of any actions taken by the provider or
15 subscriber as a result of the communications.
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**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Facebook, and my official title is _____. I am a custodian of records for Facebook. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Facebook, and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Facebook; and
- c. such records were made by Facebook as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature